

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 04-10370-RGS
)	
v.)	VIOLATIONS:
)	
1. RYAN MARTIN,)	21 U.S.C. § 846 -
2. NICHOLAS ZACCARO,)	Conspiracy to Distribute and
3. JONAH ADELMAN, and)	to Possess with Intent to
4. ENRICO BOTTA,)	Distribute Oxycodone
Defendants.)	
)	21 U.S.C. § 841(a)(1) and
)	18 U.S.C. § 2 -
)	Possession with Intent to
)	Distribute and Distribution of
)	Oxycodone, and Aiding and
)	Abetting
)	
)	18 U.S.C. § 1512(b)(3) -
)	Tampering with a Witness
)	
)	21 U.S.C. § 853 -
)	Criminal Forfeiture

**UNITED STATES' BILL OF PARTICULARS
FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

The Forfeiture Allegation of the Indictment seeks forfeiture, pursuant to 21 U.S.C. § 853 as a result of violations of 21 U.S.C. §§ 841 and 846, of any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such

violations, including, but not limited to the following:

- 1) \$10,000 in U.S. Currency, seized from Safe Deposit Box #58, at the Middlesex Savings Bank, 6 Main Street, Natick, Massachusetts, on or about October 19, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Shelby D. Wright
NANCY B. RUE
SHELBEY D. WRIGHT
Assistant U.S. Attorneys
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100

Dated: March 11, 2005

CERTIFICATE OF SERVICE

I certify that I have served a true copy of the foregoing upon Elliot M. Weinstein, Esquire, 228 Lewis Wharf, Boston, Massachusetts 02110, as counsel for Defendant Jonah Adelman, by first class mail, postage prepaid.

/s/ Shelby D. Wright
Shelbey D. Wright
Assistant U.S. Attorney

Dated: March 11, 2005